PAUL ALSTON 1126 JASON H. KIM 7128 ALSTON HUNT FLOYD & ING 1001 Bishop Street, Suite 1800 Honolulu, Hawai'i 96813

Telephone: (808) 524-1800 Facsimile: (808) 524-4591 E-mail: palston@ahfi.com ikim@ahfi.com

JOHN P. DELLERA 6602 HAWAI'I DISABILITY RIGHTS CENTER 1132 Bishop Street, Suite 2102 Honolulu, Hawai'i 96813

Telephone: (808) 949-2922 Facsimile: (808) 949-2928

E-mail: john@hawaiidisabilityrights.org

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

R.P.-K., through his parent C.K., R.T.D., through his parents R.D. and M.D., B.P., through her parent M.P., and C.B., through his parent N.B., for themselves and on behalf of a class of those similarly situated, and the HAWAII DISABILITY RIGHTS CENTER, in a representative capacity on behalf of its clients and all others similarly situated,

Plaintiffs,

VS.

DEPARTMENT OF EDUCATION, State of Hawai'i, CIVIL NO. CV10 00436 DAE-KSC (Other Civil Action)

PLAINTIFFS' RENEWED
MOTION FOR A PRELIMINARY
INJUNCTION; MEMORANDUM;
DECLARATION OF JASON H.
KIM, EXHIBITS A-F;
DECLARATION OF J.K.,
EXHIBITS I-J; DECLARATION OF
N.W., EXHIBITS K-L;
DECLARATION OF A.K.,
EXHIBITS M-N, DECLARATION
OF B.C., EXHIBITS O-P;
DECLARATION OF S.T.,
EXHIBITS Q-R; DECLARATION
OF L.D., EXHIBITS S-T;

	CERTIF	TCATE OF SERVICE
Defendants.		
	TRIAL:	October 25, 2011

PLAINTIFFS' RENEWED MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs through their undersigned attorneys move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a preliminary injunction requiring the DOE to continue to provide educational and related services until the conclusion of this action to K.K., M.W., A.C.K., K.C., A.D., and M.L. and to all other members of the Plaintiff class who have qualified for Extended School Year services.

This motion is based upon the attached memorandum, declarations, and exhibits and upon such further evidence and argument as may be presented prior to or during a hearing on this motion.

DATED: Honolulu, Hawai'i, August 1, 2011.

/s/ Jason H. Kim
JOHN P. DELLERA
PAUL ALSTON
JASON H. KIM
Attorneys for Plaintiffs

786239v1/9966-1 2